

BEFORE THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

DOCKET NO. 2014-246-E

In re: Petition to Establish)	
Generic Proceeding Pursuant to the)	PETITION TO INTERVENE
Distributed Energy Resources)	OF THE ELECTRIC COOPERATIVES
Program Act,)	OF SOUTH CAROLINA, INC. AND
Act No. __ of 2014,)	CENTRAL ELECTRIC POWER
Ratification no. 241)	COOPERATIVE, INC.
Senate Bill No. 1189)	
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)	
)	

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission’s Rules of Practice and Procedure, Central Electric Power Cooperative, Inc. (“Central”) and The Electric Cooperatives of South Carolina, Inc. (“ECSC”) (jointly referred to as the “Petitioners”) hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, Central and ECSC state as follows:

1) Central is a generation and transmission electric cooperative formed under SC Code Section 33-49-10, *et. seq.* Central’s principal place of business is 121 Greystone Boulevard, Columbia, South Carolina 29202. Central’s mailing address is P.O. Box 1455, Columbia, South Carolina 29202. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the state of South Carolina. Central’s distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.

2) ECSC consists of member electric cooperatives organized in the State of South Carolina. ECSC serves as a legal and regulatory representative of its member electric cooperatives.

ECSC is the state-wide service and trade association for electric cooperatives in the state. ECSC's members are twenty consumer-owned electric cooperatives, one wholesale power supply cooperative (Central) and one materials supply cooperative. Together, ECSC's members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all 46 counties use electricity from electric cooperatives. ECSC's principal place of business is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

3) Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

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4) The Commission opened this proceeding on the petition of the Office of Regulatory Staff filed pursuant to Section 58-40-20(F)(4) of the Distributed Energy Resource Program Act ("the Act"), which charges the Commission with conducting a generic proceeding "for the purposes of implementing the requirements of Chapter 40, Net Metering, with respect to the net energy metering rates, tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits".

5) The Act requires each of the states' distribution electric cooperatives to adopt net metering policies and programs that allow leasing of distributed generation equipment. The net metering programs must be reported to the ORS by June 2, 2015. Section 7 of the Act; S.C. Code Section 58-27-2610(H).

6) The Act requires the electric cooperatives to "consider the general objectives of [the Act] and any methodology promulgated thereunder" in formulating their net metering policies. See Section 7 of the Act. Given this legislative mandate, the methodology adopted by the Commission in the instant proceeding will be relevant to the manner in which electric cooperatives establish the required net metering policies.

7) Recognizing the broad implications of the generic proceeding, the General Assembly explicitly stated "all interested parties shall be allowed to participate" and "propose methodologies" for setting net metering rates and credits in the generic proceeding. S.C. Code Section 58-40-20(F)(4).

8) In light of the above, the Petitioners have standing to intervene in the generic proceeding and represent the interests of their members. Petitioners and their member cooperatives have a direct and material interest in the issues to be addressed and resolved by the Commission, and their interests cannot be represented adequately by any other party; furthermore, Petitioners' involvement in these proceedings will promote the public interest by furthering the development of consistent distributed generation policies among the state's electricity providers.

WHEREFORE, Petitioners pray that they will be allowed to intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as parties, engage in discovery and participate in all hearings by offering testimony and exhibits, and cross-examining

witnesses. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Charles L.A. Terreni", written over a horizontal line.

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